

STATE OF SOUTH CAROLINA

(Caption of Case)  
In the Matter of:

Application of Duke Energy Carolinas,  
LLC for Approval of Energy Efficiency  
Plan Including an Energy Efficiency Rider  
and Portfolio of Energy Efficiency Programs

BEFORE THE  
PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA

COVER SHEET

DOCKET

NUMBER: 2007 - 358 - E

(Please type or print)

Submitted by: J. Blanding Holman, IV

SC Bar Number: 72260

Address: Southern Environmental Law Center  
200 W. Franklin Street, Suite 330  
Chapel Hill, NC 27516

Telephone: (919)967-1450

Fax: (919)929-9421

Other: \_\_\_\_\_

Email: BHolman@SELCNC.org

NOTE: The cover sheet and information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is required for use by the Public Service Commission of South Carolina for the purpose of docketing and must be filled out completely.

**DOCKETING INFORMATION** (Check all that apply)

- ☐ Emergency Relief demanded in petition      ☐ Request for item to be placed on Commission's Agenda expeditiously
- ☐ Other: \_\_\_\_\_

INDUSTRY (Check one)	NATURE OF ACTION (Check all that apply)			
<input checked="" type="checkbox"/> Electric	<input type="checkbox"/> Affidavit	<input type="checkbox"/> Letter	<input type="checkbox"/> Request	
<input type="checkbox"/> Electric/Gas	<input type="checkbox"/> Agreement	<input type="checkbox"/> Memorandum	<input type="checkbox"/> Request for Certification	
<input type="checkbox"/> Electric/Telecommunications	<input type="checkbox"/> Answer	<input checked="" type="checkbox"/> Motion	<input type="checkbox"/> Request for Investigation	
<input type="checkbox"/> Electric/Water	<input type="checkbox"/> Appellate Review	<input type="checkbox"/> Objection	<input type="checkbox"/> Resale Agreement	
<input type="checkbox"/> Electric/Water/Telecom.	<input type="checkbox"/> Application	<input type="checkbox"/> Petition	<input type="checkbox"/> Resale Amendment	
<input type="checkbox"/> Electric/Water/Sewer	<input type="checkbox"/> Brief	<input type="checkbox"/> Petition for Reconsideration	<input type="checkbox"/> Reservation Letter	
<input type="checkbox"/> Gas	<input type="checkbox"/> Certificate	<input type="checkbox"/> Petition for Rulemaking	<input type="checkbox"/> Response	
<input type="checkbox"/> Railroad	<input type="checkbox"/> Comments	<input type="checkbox"/> Petition for Rule to Show Cause	<input type="checkbox"/> Response to Discovery	
<input type="checkbox"/> Sewer	<input type="checkbox"/> Complaint	<input type="checkbox"/> Petition to Intervene	<input type="checkbox"/> Return to Petition	
<input type="checkbox"/> Telecommunications	<input type="checkbox"/> Consent Order	<input type="checkbox"/> Petition to Intervene Out of Time	<input type="checkbox"/> Stipulation	
<input type="checkbox"/> Transportation	<input type="checkbox"/> Discovery	<input type="checkbox"/> Prefiled Testimony	<input type="checkbox"/> Subpoena	
<input type="checkbox"/> Water	<input type="checkbox"/> Exhibit	<input type="checkbox"/> Promotion	<input type="checkbox"/> Tariff	
<input type="checkbox"/> Water/Sewer	<input type="checkbox"/> Expedited Consideration	<input type="checkbox"/> Proposed Order	<input type="checkbox"/> Other:	
<input type="checkbox"/> Administrative Matter	<input type="checkbox"/> Interconnection Agreement	<input type="checkbox"/> Protest		
<input type="checkbox"/> Other:	<input type="checkbox"/> Interconnection Amendment	<input type="checkbox"/> Publisher's Affidavit		
	<input type="checkbox"/> Late-Filed Exhibit	<input type="checkbox"/> Report		

# SOUTHERN ENVIRONMENTAL LAW CENTER

200 WEST FRANKLIN STREET, SUITE 330  
CHAPEL HILL, NC 27516-2559

Telephone 919-967-1450  
Facsimile 919-929-9421  
selcnc@selcnc.org

Charlottesville, VA  
Chapel Hill, NC  
Atlanta, GA  
Asheville, NC  
Sewanee, TN

January 25, 2008

*VIA ELECTRONIC FILING AND U.S. MAIL*

Mr. Charles L.A. Terreni  
Chief Clerk of the Commission  
S.C. Public Service Commission  
P.O. Drawer 11649  
Columbia, SC 29211

RE: Application of Duke Energy Carolinas, LLC for Approval of Energy Efficiency  
Plan Including and Energy Efficiency Rider and Portfolio of Energy Efficiency  
Programs (Docket No. 2007-358-E)

Dear Mr. Terreni:

Please find enclosed for filing in the above-referenced docket the original and two copies of a Motion for Admission *Pro Hac Vice* and Verified Application of Gudrun Elise Thompson. Kindly date-stamp the extra copy and return it to me in the stamped, self-addressed envelope enclosed for your convenience. By copy of this letter I am serving a copy of the enclosed documents on all parties of record via electronic mail. If you have questions, please do not hesitate to contact me.

Sincerely,

s/Kate Double  
Legal Assistant

Enclosures

Cc (w/encl.): Parties of Record (via electronic mail)

STATE OF SOUTH CAROLINA  
BEFORE THE PUBLIC SERVICE COMMISSION

DOCKET NO. 2007-358-E

In the Matter of:	)	
Application of Duke Energy Carolinas, LLC	)	
for Approval of Energy Efficiency Plan	)	
Including an Energy Efficiency Rider and	)	MOTION FOR ADMISSION
Portfolio of Energy Efficiency Programs	)	<i>PRO HAC VICE</i>
	)	

Environmental Defense (“ED”), the South Carolina Coastal Conservation League (“CCL”), the Southern Environmental Law Center (“SELC”), and Southern Alliance for Clean Energy (“SACE”) hereby move the South Carolina Public Service Commission (“Commission”) to permit Gudrun Elise Thompson to practice *Pro Hac Vice* before the Commission in the above-captioned proceeding.

Pursuant to Rule 404, SCACR, Ms. Thompson, with the consent of counsel of record, is simultaneously filing with the South Carolina Supreme Court a copy of the Verified Application for Admission *Pro Hac Vice* in the State of South Carolina.

WHEREFORE, in accordance with the provisions set forth in Rule 404, SCACR, ED, CCL, SELC and SACE respectfully request that this motion be granted.

This 25th day of January, 2008.

---

s/ J. Blanding Holman, IV  
Southern Environmental Law Center  
200 W. Franklin Street, Suite 330  
Chapel Hill, NC 27516  
Telephone: (919) 967-1450  
Fax: (919) 929-9421

# SOUTHERN ENVIRONMENTAL LAW CENTER

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selcnc@selcnc.org

Charlottesville, VA  
Chapel Hill, NC  
Atlanta, GA  
Asheville, NC  
Sewanee, TN

January 25, 2008

South Carolina Supreme Court  
Office of Bar Admissions  
P.O. Box 11330  
Columbia, South Carolina 29211

*VIA U.S.P.S. EXPRESS MAIL*

RE: Application of Duke Energy Carolinas, LLC for Approval of Energy Efficiency Plan Including and Energy Efficiency Rider and Portfolio of Energy Efficiency Programs (S.C.P.S.C. Docket No. 2007-358-E)

Dear Clerk:

Please find enclosed for filing two copies of the Verified Application for Admission Pro Hac Vice of Gudrun Elise Thompson in the above-referenced docket. I also enclose a check in the amount of \$250.00 for the required filing fee. Please date-stamp the extra copy of the Application and return it to me in the stamped, self-addressed envelope enclosed for your convenience. Thank you for your assistance; please do not hesitate to contact me should you need additional information.

Sincerely,



Kate Double  
Legal Assistant

Enclosures

Cc (w/encl.): Parties of Record (via electronic mail)

**VERIFIED APPLICATION FOR ADMISSION *PRO HAC VICE*  
IN THE STATE OF SOUTH CAROLINA**

Application of Duke Energy Carolinas,  
LLC for Approval of Energy Efficiency  
Plan Including an Energy Efficiency Rider  
and Portfolio of Energy Efficiency  
Programs

Docket No. 2007-358-E

Public Service Commission of  
South Carolina

Plaintiff

Case No.

Court

vs.

Mailing Address of Court: P.O. Drawer 11649  
Columbia, SC 29211

Defendant

Comes now Gudrun Elise Thompson, applicant herein, and respectfully represents the following:

1. Applicant resides at:

5423 Bobcat Road

Street Address

Chapel Hill

Orange

North Carolina

27516

City

County

State

Zip Code

(919) 968-4643

Telephone

2. Applicant is an attorney and a member of the law firm of (or practices law under the name of) Southern

Environmental Law Center, with offices at, at

200 W. Franklin St., Suite 330

Street Address

Chapel Hill

Orange

North Carolina

27516

City

County

State

Zip Code

919-967-1450

Telephone

919-929-9421

Fax Number

3. Applicant has been retained personally or as a member of the above named law firm by Environmental Defense, South Carolina Coastal Conservation League, Southern Alliance for Clean Energy and Southern Environmental Law Center to provide legal representation in connection with the above case now pending before the above named court of the State of South Carolina.

4. Since August of 2002, applicant has been, and presently is, a member in good standing of the bar of the highest court of the District of Columbia or the State of North Carolina where applicant regularly practices law. Attached is a certificate of good standing.

5. Applicant has been admitted to practice before the following courts: (List all of the following courts applicant has been admitted to practice before: United States District Courts; United States Circuit Courts of Appeals; the Supreme Court of the United States; and courts of other states or the District of Columbia.)

Court:

Date Admitted:

North Carolina state courts	August 27, 2002
U.S. District Court for the Eastern Dist. of North Carolina	September 5, 2002



Applicant is presently a member in good standing of the bars of those courts listed above, except as listed below:  
(List any court named in the preceding paragraph that applicant is no longer admitted to practice before.)

not applicable

6. Applicant presently is not subject to any suspension or disbarment proceedings, and has not been formally notified of any complaints pending before a disciplinary agency, except as provided below (give particulars, e.g., jurisdiction, court, date):

not applicable

7. Applicant never has had any application for admission *pro hac vice* in this or any other jurisdiction denied or any *pro hac vice* admission revoked, except as provided below (give particulars, e.g., date, court, docket number, judge, circumstances; attach a copy of any order of denial or revocation):

not applicable

8. Applicant never has had any certificate or privilege to appear and practice before any administrative body suspended or revoked, except as provided below (give particulars, e.g., date, administrative body, date of suspension and reinstatement):

not applicable

9. Local counsel of record associated with applicant in this case is J. Blanding Holman IV, of the Southern Environmental Law Center law firm, which has offices at:

38 Broad Street, Suite 200

Street Address

Charleston

Charleston

South Carolina

29401-3042

County

City

State

Zip Code

843-720-5270

Telephone

If applicable list all other firms/attorneys you are associated with in this matter

not applicable

10. Applicant has previously filed an application to appear *pro hac vice* in the following South Carolina cases (give case name and status of litigation, date of application, local counsel of record in each case, and state whether application is pending or was granted).

not applicable

11. Applicant agrees to comply with the applicable statutes, laws and rules of the State of South Carolina and will familiarize him/herself with and comply with the South Carolina Rules of Professional Conduct. Applicant consents to the jurisdiction of the South Carolina courts and Commission on Lawyer Conduct.

12. Applicant respectfully requests to be admitted to practice in the above named court for this case only.

DATED this 25th day of January, 2008.

Gudrun  
APPLICANT

**VERIFICATION**

STATE OF NORTH CAROLINA)

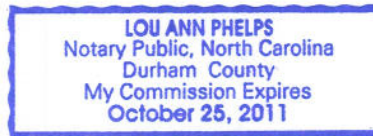
COUNTY OF ORANGE)

I, Gudrun Elise Thompson, do hereby swear or affirm under penalty of perjury that I am the applicant in the above styled matter; that I have read the foregoing application and know the contents thereof; and that the contents are true of my own knowledge, except as to those matters stated on information and belief, and that as to those matters I believe them to be true.

Gudrun  
APPLICANT/AFFIANT

Subscribed and sworn to before me this 25th day of January, 2008.

Lou Ann Phelps  
Lou Ann Phelps, Notary Public  
Notary Public for the State of North Carolina



My Commission Expires: October 25, 2011

**LOCAL COUNSEL CONSENT**

I hereby consent, as local counsel of record, to the association of applicant in this cause pursuant to Rules Governing Admission *Pro Hac Vice* to the South Carolina Bar.

DATED this 25th day of January, 2008.

J. Blending Holman IV  
LOCAL COUNSEL OF RECORD

By Kate Double with express permission

**CERTIFICATE OF SERVICE**

I hereby certify that I have served a copy of this application upon the South Carolina Supreme Court by mail addressed to: South Carolina Supreme Court Office of Bar Admissions, PO Box 11330, Columbia, SC 29211, accompanied by payment of the \$250 filing fee payable to the South Carolina Supreme Court on this 25th day of January, 2008.

Gudrun  
APPLICANT/AFFIANT

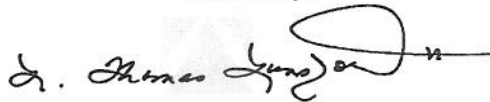
# The North Carolina State Bar

I, L. Thomas Lunsford, II, Secretary of the North Carolina State Bar, do hereby certify that Ms. Gudrun Elise Thompson (28829) is an active member of the North Carolina State Bar in good standing as of this date, and was duly licensed to practice law in this state on August 27, 2002.

I further certify that as of this date the above named attorney has not been subject to any public disciplinary action by the North Carolina State Bar.

Given over my hand and the Seal of the North Carolina State Bar, this 24th day of January, 2008.

Sincerely,

A handwritten signature in cursive script, appearing to read "L. Thomas Lunsford, II", followed by a horizontal line.

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Secretary of the North Carolina State Bar



## CERTIFICATE OF SERVICE

I hereby certify that the following persons have been served with the Motion for Admission Pro Hac Vice and Verified Application of Gudrun Elise Thompson by electronic mail:

Catherine E. Heigel , Assistant General  
Counsel  
Duke Energy Carolinas, LLC  
Post Office Box 1006, EC03T  
Charlotte, NC, 28201-1066  
Email: ceheigel@duke-energy.com

Frank R. Ellerbe III , Counselor  
Robinson, McFadden & Moore, P.C.  
P.O. Box 944  
Columbia, SC, 29202  
Email: fellerbe@robinsonlaw.com

Nanette S. Edwards, Counsel  
Office of Regulatory Staff  
Post Office Box 11263  
Columbia, SC, 29211  
Email: nsedwar@regstaff.sc.gov

Jeremy Hodges, Counsel  
Nelson, Mullins, Riley & Scarborough,  
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Columbia, SC 29201  
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jeremy.hodges@nelsonmullins.com

Robert E. Tyson, Jr.  
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Lawrence B. Somers, Assistant General  
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Post Office Box 1244, PB05E  
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Bonnie D. Shealy , Counsel  
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Scott Elliott , Counsel  
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James H. Jeffries IV, Counsel  
Moore & Van Allen PLLC  
Bank of America Corporate Center  
100 North Tryon Street, Suite 4700  
Charlotte, NC 28202-4003  
Email: jimjeffries@mvalaw.com

This 25th day of January, 2008.

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s/ Kate Double